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19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,
23
24 Plaintiff,

25 vs.

26 MICHAEL HALPRIN,
27
28 Defendant.

Case No.: 2:19-cr-00154-RFB-VCF-2

**JOINT STIPLUATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR JUNE 22,
2023**

IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,
United States Attorney, District of Nevada, and NADIA AHMED and JACOB OPERSKALSKI,
Assistant United States Attorneys, representing the United States of America, and LOUIS
PALAZZO, NATHAN GARRETT, and LUCINDA LUETKEMEYER, representing Defendant
Michael Halprin, that the sentencing hearing scheduled for June 22, 2023, at 9:00 a.m., in the

1 above-captioned matter, be vacated and continued to a date and time to be set by this Honorable
2 Court but no sooner than one hundred fifty (150) days.

3 This stipulation is entered into for the following reasons:

4 1. Sentencing in this matter is currently scheduled for June 22, 2023, at 9:00 a.m.

5 2. On May 9, 2023, counsel for co-defendant Eghomware Igbinovia, aka Jerry Igbinovia,
6 and the government jointly moved to continue the calendar call and trial now scheduled for June
7 5, 2023, out at least 30 days to a date and time convenient to this Court. Dkt. No. 365.

8 3. Defense counsel needs additional time to investigate issues relevant to sentencing and
9 prepare for sentencing.
10

11 4. Mr. Halprin has appeared in this case, and is not in custody and, along with the
12 government, agrees to this continuance.
13

14 5. The additional time requested herein is not sought for purposes of delay and the denial of
15 this request for a continuance could result in a miscarriage of justice.
16

17 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
18 hearing for good cause. Good cause exists in this case.

19 7. Counsel for Defendant Michael Halprin and the government agree a continuance of the
20 sentencing hearing is in the best interests of justice.

21 8. For all the above-stated reasons, the ends of justice would be best served by the
22 continuance of the sentencing hearing.
23

24 This is the third request for a continuance of the sentencing hearing.
25

26
27 DATED: May 11, 2023.
28

1 PALAZZO LAW FIRM
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By /s/ Nathan F. Garrett

4 T. Louis Palazzo, Esquire

GRAVES GARRETT, LLC

5 Nathan F. Garrett, *pro hac vice*

6 Lucinda H. Luetkemeyer, *pro hac vice*

Counsel for Defendant Michael Halprin

7 JASON FRIERSON

8 United States Attorney

9 By /s/ Jacob Operskalski

Jacob Operskalski

10 Assistant United States Attorney

ORDER

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for June 22, 2023, at the hour of 9:00 a.m., be vacated and continued to **November 09, 2023 at 2:30 pm.**

DATED this the 12th day of May, 2023.

A handwritten signature in black ink, appearing to be 'RFB' with a large, stylized 'B' and a horizontal line extending to the right.

THE HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE